

JAP:KKO

**M 12- 078**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

NORBELIS SUAREZ,

Defendant.

PRE-ARRAIGNMENT  
C O M P L A I N T

(21 U.S.C. §§ 952(a)  
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JACK LEE, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 24, 2012, within the Eastern District of New York and elsewhere, defendant NORBELIS SUAREZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:<sup>1/</sup>

1. On or about January 24, 2012, the defendant NORBELIS SUAREZ arrived at JFK International Airport ("JFK") in Queens, New York aboard American Airlines flight no. 1928 from Santo Domingo, Dominican Republic.

2. Customs and Border Protection ("CBP") Officers approached defendant NORBELIS SUAREZ for a Customs inspection. She presented two suitcases for examination, one black and red "Express" suitcase and one blue "Clipper Club" suitcase. SUAREZ was in possession of baggage claim stubs for both suitcases and acknowledged ownership of both suitcases.

3. During the inspection, defendant NORBELIS SUAREZ appeared nervous and exhibited fast and heavy breathing and skaking hands.

4. During the inspection of the "Express" suitcase, CBP officers found a medicine box containing a plastic bag of coffee grinds. Within the plastic bag of coffee grinds, CBP officers found 13 pellets.

5. Defendant NORBELIS SUAREZ was then escorted to a private room for a pat-down search. The pat-down search yielded negative results.

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

6. The pellets found in defendant NORBELIS SAUREZ's suitcase were probed and revealed a white powdery substance. The substance field-tested positive for cocaine and defendant NORBELIS SUAREZ was placed under arrest.

7. Defendant NORBELIS SAUREZ was then presented with an x-ray consent form, which she read, appeared to understand and signed.

8. Defendant NORBELIS SAUREZ was then transported to the medical facility at JFK where an x-ray was taken of the defendant's intestinal tract, which was positive for foreign bodies.

9. Thus far, defendant NORBELIS SAUREZ has passed ten pellets containing a substance that field-tested positive for cocaine. SUAREZ will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

10. The total weight of the white powdery substance found inside the suitcase that field-tested positive for cocaine is 148.4 grams.

WHEREFORE, your deponent respectfully requests that the defendant NORBELIS SAUREZ be dealt with according to law.

Jack Lee  
JACK LEE  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
25th day of January, 2012

MA  
HONORA  
UNITED  
EASTER

S/Pohorelsky

LSKY  
UDGE  
RK